

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

THE SATANIC TEMPLE, INC. and ANN DOE
PLAINTIFF,

v.

JOHN WILLIAM HELLERSTEDT, MD, in his
official capacity as Executive Commissioner of
the TEXAS DEPARTMENT OF STATE HEALTH
SERVICES,

TEXAS DEPARTMENT OF STATE HEALTH
SERVICES, and

PLANNED PARENTHOOD CENTER FOR
CHOICE, INC.

DEFENDANTS.

CASE NO. 4:21-cv-00387

UNSWORN DECLARATION OF ANN DOE

STATE OF LOUISIANA

§

§

PARISH OF LAFAYETTE

§

1. My name is Ann Doe. I am over the age of 18, of sound mind, and capable of making this unsworn declaration.
2. I am submitting this declaration anonymously to avoid the catastrophic side-effects from the controversy surrounding this case and the deeply personal nature of the subject of this dispute
3. I am a member of The Satanic Temple (“**TST**”) and hold its tenets as sincere religious beliefs. The tenets of TST are attached to this declaration as Exhibit A-1.
4. I am a pregnant woman. I reside more than 100 miles from the nearest abortion clinic. The nearest abortion clinic to my home which offers an abortion at a rate that I can afford is the Planned Parenthood facility in Houston, TX. I have been a member of TST since before I became pregnant. I want to participate in TST’s Satanic Abortion Ritual (the “**Ritual**”) unrestrained by the Texas regulations described below.
5. I am being forced to comply with certain regulations to which I have a religious objection. My decision to engage in the Ritual is meaningfully different from a secular abortion. As a member of TST, I venerate the biblical concept *ha satan* (literally: “the adversary” or “the accuser”). *Ha satan* is a description of being, not a particular individual. I am a nontheistic Satanist who venerates the concept of the Biblical Satan. I participate in various rituals, but does not literally

worship the divine entity that Christians identify as “The Devil” and do not have any expectation that participating in a ritual, by itself, will affect the outside world.

6. I believe in the power of ritual and believes that authority should be rebelled against (or “accused”) if it is tyrannical. Specifically, I subscribe to TST’s doctrinal position that the regulations imposed by Texas amount to “tyranny.”
7. I believe in an inversion of the traditional Christian norms. I believe that the self should be assigned a greater importance to the outside world. This is an inversion of the Christian norm that the outside world (e.g., God and Church) may freely dictate the thoughts and actions of the adherents. Likewise, I do not subscribe to humility as a virtue and self-deprecation as a lifestyle. I do not denigrate desires and practices that I enjoy and which do not harm others. I hold the Third Tenet as one of my beliefs as a member of TST.
8. The Ritual allows me to express my sincerely held beliefs as a member of TST. My participation in this ritual is intended to help cast off any guilt, shame, or mental discomfort I may experience in connection with my election to abort the pregnancy.
9. The Ritual further confirms my choice and wards off any effects of unjust persecution. Here, my perception of the unjust persecution is that it is an effort by the State (the “outside world”) to infringe on my decision-making about my own health decision (the “inside world.”) I perceive the State’s intrusion into my decision about my own body is a tyrant overpowering my resistance to compel beliefs and actions. In other words, I see the State’s actions as an abuse of power. I understand the abortion regulations as placing the State in the role of tyrant-king which claims divine authority to in an effort to make me as a Satanist feel guilt, doubt, and shame on an issue of religious significance. This is deeply offensive to me as someone who subscribes to the Third Tenet.
10. I discovered I was pregnant on January 13, 2021. I considered my options and resolved to abort the pregnancy through the Ritual. On January 14, I contacted the Planned Parenthood facility in Houston, TX to arrange for a medical appointment to complete the Ritual.
11. In my communications with the facility, I learned of certain abortion regulations that impede my ability to participate in the Ritual. Specifically, I take issue with the following regulations:
 - (a) The requirement to have a sonogram as a precondition of obtaining an abortion,
 - (b) The forced decision to reject the “opportunity” of seeing the sonogram results,
 - (c) The forced listening to a narrative of the sonogram results, and
 - (d) The mandatory waiting period between the sonogram and receiving the abortion.
12. My understanding is that none of these regulations are medically necessary. The first three regulations require me to disrupt the Ritual and directly violate the Fifth Tenet of my belief as a member of TST. The fourth regulation requires a medically unnecessary delay during the

Ritual. I am concerned that the waiting period may require me to wait in my car due to COVID-19 restrictions on occupancy at the clinic. This waiting period would further subject me to potential protesters that would undermine my ability to experience the benefits of the Ritual – especially the removal of shame or guilt from the abortive act.

13. I understand that the sonogram makes the abortion cost \$150 more than it would otherwise cost. I have limited financial resources. I do not want to expend my limited funds on a medically unnecessary procedure to which I object. By regulating the abortive act and refusing to grant an exemption for the Ritual, the State has placed a barrier between me and my ceremony.
14. I sought a religious exemption to these regulations, by contacting the clinic on January 22, 2021. I sought the exemption because the regulations violate my beliefs and because they substantially interfere with the Ritual. The facility informed me that it could not provide an exemption. I do not fault the facility for failing to provide a religious exemption, because I understand that – as written – the regulations at issue do not provide for religious exemptions. I understand that if the facility were to grant an exemption, it could face sanctions from the State of Texas.
15. I understand that an attorney sent a demand letter to Planned Parenthood and the State of Texas. A true and correct copy of that demand letter is attached to this declaration as Exhibit A-2.
16. I have an appointment for an abortion procedure on February 6, 2021. My ability to participate in the procedure as part of the Ritual for my religious practice will be significantly burdened if the regulations listed in Paragraph 11 are enforced during the Ritual.

I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 4, 2021,

A handwritten signature in black ink, appearing to read "Ann Doe", enclosed within a blue rectangular border.

ID acdPsyKV3cKCM76CmyriX5dv

Ann Doe